

JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Springfield Regional Office
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Springfield, MO 65807
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Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

Greene County/WMP
Resource Services, Inc.

June 30, 1987

Mr. William E. Plank, President
Resource Services, Inc.
P.O. Box 4085
Springfield, MO 65808

Dear Mr. Plank:

Please find enclosed the PCB Facility Compliance Inspection Report for the Resource Services, Inc. facility at Springfield in Greene County, Missouri. The report, I believe, is self-explanatory.

If Resource Services, Inc. is not going to close the facility by September 1, 1987, you must either submit a revised schedule of closure or, if the facility is to continue to operate, you must submit documentation indicating compliance with 10 CSR 25-13.010.

If you have any questions regarding this matter, please contact Charles L. Kroeger of this office.

Sincerely,

SPRINGFIELD REGIONAL OFFICE

A handwritten signature in black ink, appearing to read "John R. Nixon".

John R. Nixon, P.E.
Administrator

JRN/CLK/cg

Enclosure

cc: ~~Mr. J. Randal Lyman, Springfield Sanitary Services~~
Mr. Tom Judge, Waste Management Program

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PCB FACILITY COMPLIANCE INSPECTION REPORT

Resource Services, Inc.

2457 E. Livingston

Springfield, MO 65808

(417) 831-9906

EPA ID #MOD980688832

MO ID # none

Facility Contact: Mr. William E. Plank, President

INTRODUCTION:

On June 23, 1987, Charles L. Kroeger, Springfield Regional Office, Department of Natural Resources, conducted a PCB facility compliance inspection at the Resource Services, Inc. (RSI) facility at Springfield in Greene County, Missouri. The facility basically receives and consolidates oil containing PCB's, capacitors and transformers containing PCB oil, and solid materials such as soil that is contaminated with PCB's due to spills. These products are accumulated then shipped to one of several PCB disposal facilities. Sealed capacitors are sent to be shredded and incinerated. Drained transformers are landfilled and waste oil is incinerated or chemically treated. RSI is in the process of removing all of the accumulated material and closing down the facility. Mr. Plank indicated they were in contact with EPA on Friday, June 19, 1987, regarding this matter. They expect to be totally closed out in 60 days. The last shipment of waste was received on June 11, 1987.

Mr. Plank indicated that EPA had conducted a compliance inspection within the last month and they had also done sampling at the facility during the week of June 15, 1987. Because of differences in the agencies regulations, the Department of Natural Resources proceeded with the June 24, 1987 inspection.

At the time of the inspection there were approximately 1,000 drums of waste in storage. According to Mr. Plank this was about one month's accumulation. Arrangements are being made to dispose of the waste. In addition to drums of waste and transformers stored in the building there were several metal dumpsters of sealed capacitors stacked outside the building awaiting disposal.

The enclosed storage area north of the building is used to store transformers of oil that contain less than 50 ppm PCB's, drained transformers that had PCB concentrations of less than 500 ppm, empty drums and bins and transport vehicles.

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As transformers are received the oil is pumped from them into drums. A lab analysis report is received on each shipment of PCB's. Large transformers are left on the truck and the oil is pumped to drums prior to them being off-loaded. There had been 190 shipments received in 1987.

The oil is transferred to a tanker unit when removed from the Springfield accumulation and storage unit. Solid waste and leaking capacitors are shipped in drums. Drums are pressure tested prior to reuse.

UNSATISFACTORY FEATURES:

1. There was no written waste analysis plan as required by 10 CSR 25-13.010 (5)(C) 2, cross-referenced to 40 CFR 265.13 (b).
2. RSI does not conduct and record routine inspections on the storage area nor on emergency, security, operating and structural equipment as required by 10 CSR 25-13.010 (5)(C) 2, cross-referenced to 40 CFR 265.15.
3. RSI does not have a formal written Personnel Training Plan nor has it documented training as required by 10 CSR 25-13.010 (5)(C) 2, cross-referenced to 40 CFR 265.16.
4. There was not adequate aisle space in the waste storage area as required by 10 CSR 25-13.010 (5)(C) 2, cross-referenced to 40 CFR 265.35.
5. There were no formal arrangements with local emergency agencies other than with the fire department as required by 10 CSR 25-13.010 (5)(C) 2, cross-referenced to 40 CFR 265.37.
6. The Contingency Plan did not give the location and capabilities of the emergency and decontamination equipment at the facility as required by 10 CSR 25-13.010 (5)(C) 2, cross-referenced to 40 CFR 265.52 (3).
7. The facility did not have a written Closure Plan as required by 10 CSR 25-13.010 (5)(C) 2, cross-referenced to 40 CFR 265.112.
8. The facility did not comply with the financial requirements as required by 10 CSR 25-13.010 (5)(C) 2, cross-referenced to 40 CFR Subpart H.

COMMENTS:

RSI was not familiar with all of the state paperwork requirements of 10 CSR 25-13.010 Polychlorinated Biphenyls. Some of the standard paperwork and recording procedures at the facility were adequate to meet part of the 10 CSR requirements. The company was working on a closure plan and the cost estimates when the decision on closing the facility was made. These have not yet been completed, however.

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There is no waste analysis plan at the facility but all oil is tested by Environmetrics before it is picked up. There is also a Chlorinol test kit available at the facility. Waste shipped off-site is batch tested.

The only inspections routinely performed and recorded are the weekly check for leakers. Notes are made on the inspection form regarding handling of any leakers found.

New employees are given a manual and documents on safe and proper handling of PCB's. Employees periodically attended seminars and meetings on PCB handling and shared this information with other employees upon returning. Written personnel training procedures and annual review however are not provided.

There is no internal communication or alarm system in the storage area however employees are directed not to work alone. There is a phone in the adjacent room.

Aisles in the hazardous waste storage area were obstructed with equipment and drums of waste were stacked such that prompt removal of a leaking drum was not possible. Mr. Plank indicated they are presently working to get all the material out of storage.

Mr. Plank indicated that RSI has had inspections by the fire department but they have no written formal arrangements with the fire department nor with the police, hospital or other emergency agencies.

The contingency plan at the facility listed the emergency equipment to be on hand but did not give its location nor a description of its capabilities.


RECOMMENDATIONS:

1. Provide a written waste Analysis Plan for waste received and generated at the facility.
2. Conduct and record routine inspections of emergency, security, operating and structural equipment.
3. Provide a written Personnel Training Plan including, but not limited to, description of type and amount of training, job title and description of each person taking the training, name of the person and documentation that training has been given with an annual review.
4. Provide and maintain adequate aisle space for unobstructed movement of personnel and emergency equipment.
5. Make formal arrangements with local emergency agencies and emergency response contractors for participation in an emergency at the facility. Document any refusals to participate in the facility files.

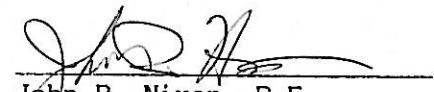
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6. Provide information on location and capabilities of lab emergency equipment. This information should be maintained and kept in the Contingency Plan.
7. Provide a written Closure Plan for the facility.
8. Comply with the financial requirements for treatment, storage and disposal facilities including the cost estimate for closure and the demonstration of financial assurance for closure.

Respectfully Submitted:


Charles L. Kroeger
Environmental Specialist

Approved:


John R. Nixon, P.E.
Administrator

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